

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Consolidated Civil Action No.:
5:21-CV-00844-XR

REPUBLICAN COMMITTEES' INITIAL DISCLOSURES

Intervenor-Defendants the Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (collectively, "Republican Committees") hereby provide these Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. The Republican Committees make these disclosures based on information reasonably and presently available to them and based on the discovery taken to date. Because discovery remains ongoing, the Republican Committees reserve the right under Rule 26(e) to modify, amend, retract, or supplement these disclosures as additional information and evidence becomes available. The Republican Committees further reserve the right to call any witness or present any document or tangible thing at trial that is identified through further investigation or discovery.

I. Individuals Likely to Have Discoverable Information That the Republican Committees May Use to Support Their Defenses (Rule 26(a)(1)(A)(i)).

The Republican Committees incorporate by reference in these disclosures the names of any and all persons (including individuals and entities) disclosed by Plaintiffs, Defendants, or

intervenors. The Republican Committees further incorporate by reference the names of any and all persons (including individuals and entities) identified by Plaintiffs, Defendants, intervenors, or any third party in any Responses to any Interrogatories, Responses to Document Requests, or Responses to Requests for Admission. The Republican Committees reserve the right to supplement and/or amend these disclosures as discovery progresses and to seek information from such disclosed persons and entities to support its defenses.

II. Description and Location of Documents, Electronically Stored Information, and Tangible Things the Republican Committees May Use to Support Their Defenses (Rule 26(a)(1)(A)(ii)).

The Republican Committees incorporate by reference in these disclosures all documents disclosed by Plaintiffs, Defendants, or intervenors. The Republican Committees reserve the right to identify additional documents as their investigation into this matter and discovery proceed. The Republican Committees also reserve the right to rely on any documents, electronically stored information, and tangible things produced by Plaintiffs, Defendants, intervenors, or any third-party during the course of this action.

III. Computation of Damages (Rule 26(a)(1)(A)(iii)).

The Republican Committees are not seeking any damages in this action.

IV. Insurance Agreements (Rule 26(a)(1)(A)(iv)).

The Republican Committees are Intervenor-Defendants. Plaintiffs have not brought any claims against the Republican Committees. Nor do Plaintiffs seek any damages or other forms of relief from the Republican Committees in this action.

November 15, 2021

/s/ John M. Gore

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Counsel for Proposed Intervenor-Defendants

**Pro hac vice* applications pending

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2021, I served counsel of record via the Court's CM/ECF system.

/s/ John M. Gore

Counsel for Proposed Intervenor-Defendants